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Attorneys for Defendant, TARGET CORPORATION

UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

LORI BRIDGES

Plaintiff,

v.

TARGET CORPORATION; DOES I through
XX, and ROE BUSINESS ENTITIES I through
XX, inclusive,

Defendants.

CASE NO: 2:24-cv-00320-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)**

Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, LORI BRIDGES ("Plaintiff"), by and through her attorney of record, AUSTIN R. WOOD, ESQ. of the law firm RICHARD HARRIS LAW FIRM and Defendant, TARGET CORPORATION, by and through its attorneys of record, LOREN S. YOUNG, ESQ. and JULIE A. FUNAI, ESQ. of the law firm LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a two-week extension for the dispositive motion deadline to give the parties additional time to continue settlement discussions and possible resolution, and accommodate travel plans.

I. DISCOVERY COMPLETED

1. Plaintiff, LORI BRIDGES served her FRCP 26(a)(1) Initial List of Witnesses and Documents on March 12, 2024.

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- 1 2. Defendant, TARGET CORPORATION served its FRCP 26(A)(1) Initial Disclosure on
- 2 March 8, 2024.
- 3 3. Defendant, TARGET CORPORATION served their Objection to Plaintiffs Initial List of
- 4 Witnesses and Documents on March 26, 2024.
- 5 4. Defendant, TARGET CORPORATION propounded its First Set of Interrogatories and
- 6 Requests for Production of Documents to Plaintiff on March 12, 2024.
- 7 5. Plaintiff, LORI BRIDGES propounded her First Set of Interrogatories, Requests for
- 8 Production of Documents, and Requests for Admission to Defendant TARGET
- 9 CORPORATION on March 12, 2024.
- 10 6. Plaintiff, LORI BRIDGES served her First Supplement to FRCP 26(A)(1) Initial List of
- 11 Witness and Documents on April 10, 2024.
- 12 7. Plaintiff served her responses to Defendant TARGET CORPORATION First Set of
- 13 Interrogatories and Requests for Production of Documents on April 11, 2024.
- 14 8. Defendant served its responses to Plaintiff LORI BRIDGE's First Set of Interrogatories,
- 15 Requests for Production of Documents and Requests for Admission on April 25, 2024.
- 16 9. Defendant TARGET CORPORATION served its First Supplemental Disclosures
- 17 Pursuant to FRCP 26(a)(1) on April 25, 2024.
- 18 10. Defendant TARGET CORPORATION served its Second Supplemental Disclosures
- 19 Pursuant to FRCP 26(a)(1) on May 3, 2024.
- 20 11. Plaintiff, LORI BRIDGES served her Second Supplement to FRCP 26(A)(1) Initial List
- 21 of Witness and Documents on June 13, 2024.
- 22 12. Plaintiff, LORI BRIDGES served her Initial Designation of Expert Witnesses and
- 23 Documents Pursuant to NRCP 16.1 on June 13, 2024.
- 24 13. Defendant TARGET CORPORATOIN served its Third Supplemental Disclosures
- 25 Pursuant to FRCP 26(a)(1) on July 11, 2024.
- 26 14. Defendant TARGET CORPORATION served its Fourth Supplemental Disclosures
- 27 Pursuant to FRCP 26(a)(1) on August 2, 2024.
- 28 15. Plaintiff's deposition was taken on August 7, 2024.

16. Defendant served its Initial Designation of Expert Witness on August 12, 2024.
17. Defendant, TARGET CORPORATION propounded its Second Set of Requests for Production of Documents to Plaintiff on August 19, 2024.
18. Defendant TARGET CORPORATION served its Fifth Supplemental Disclosures Pursuant to FRCP 26(a)(1) on August 22, 2024.
19. The 30(b)(6) Person(s) Most Knowledgeable of Target Corporation was taken on August 28, 2024.
20. Defendant served its First Supplemental Designation of Expert Witness on September 11, 2024.
21. Plaintiff, LORI BRIDGES served her Third Supplement to FRCP 26(A)(1) Initial List of Witness and Documents on September 25, 2024.
22. Plaintiff served her responses to Defendant TARGET CORPORATION Second Set of Requests for Production of Documents on September 25, 2024.

II. DISCOVERY REMAINING TO BE COMPLETED

None as Discovery is closed.

III. REASONS WHY DISCOVERY SHOULD BE EXTENDED

The parties have been diligently engaged in settlement discussions and wish to engage in continued resolution discussions, and wish to avoid unnecessary costs, fees and expenses in the interest of potential resolution, in light of completed treatment and low damages. The parties are seeking a two-week continuance to file their Dispositive Motions to allow the parties to continue to discuss settlement.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of two-weeks.

If approved, the new discovery deadlines would be modified as follows:

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	Closed	Closed
Motions to Amend Pleadings	Closed	Closed
Initial Expert Disclosures	Closed	Closed

1	Rebuttal Expert Disclosures	Closed	Closed
2	Dispositive Motions	11/10/2024	11/22/2024
3	Joint Pre-Trial Order	12/10/2024	12/23/2024¹

4 **IT IS SO STIPULATED AND AGREED.**

5 DATED this 7th day of November, 2024.

DATED this 7th day of November, 2024.

6 **LINCOLN, GUSTAFSON & CERCOS, LLP**

RICHARD HARRIS LAW FIRM

7 */s/ Loren S. Young*

/s/ Austin Wood

8 **LOREN S. YOUNG, ESQ.**

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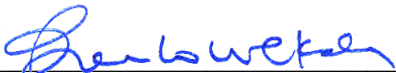
LORI BRIDGES

Attorneys for Defendant,

TARGET CORPORATION

13 **ORDER**

14 IT IS SO ORDERED.

15
16 
17 United States Magistrate Judge

18 DATED: November 14, 2024

28 ¹ Actual date is December 22, 2024, which is a Sunday.